

September 25, 2003

Mr. Thomas M. Dorman
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602

RE: Inquiry Into the Use of Contract Service Arrangements by Telecommunications
Carriers in Kentucky—Case No. 2002-00456

Dear Mr. Dorman:

Enclosed are an original and five (5) copies of Cincinnati Bell Telephone Company's Proposed Agenda for the Industry Workshop scheduled to take place on October 1, 2003 (Attachment 1). In order to facilitate discussion at the workshop, enclosed is a draft proposal for the industry participants' consideration (Attachment 2).

A duplicate original copy of this letter is enclosed; please date-stamp this copy as acknowledgement of its receipt and return it in the enclosed, self-addressed envelope. This filing is also being provided to the Commission via email for inclusion in the electronic case file. Questions regarding this filing may be directed to me at the above address or by telephone at (513) 397-7260.

Sincerely,

/s/ Jouett Kinney
Jouett Kinney
Cincinnati Bell Telephone

Attachments

INDUSTRY WORKSHOP

**Administrative Case No. 2002-00456
October 1, 2003**

PROPOSED AGENDA

- **Introduction of participants**
- **Purpose/expectations of workshop**
- **Trends regarding use of CSAs in other states**
- **Discussion of the appropriate use of CSAs**
- **Discussion of necessity, if any, of filing documentation related to CSAs with the Commission**
- **Protecting the confidentiality of the CSA customer's identity if documentation is required to be filed**
- **Discussion of submitting a specific proposal for the Commission's consideration to the extent industry participants agree on certain matters**

Joint Industry Proposal to Kentucky PSC for CSA Standards

Administrative Case No. 2002-00456

October 1, 2003

1. The following standards apply to all telecommunications carriers providing service in Kentucky – including ILECs, CLECs, and IXCs.
2. The industry recommendation for CSA standards, endorsed by the companies represented as signatories to this proposal, is as follows:
 - a. Companies may enter into contracts (CSAs) in order to meet competition or in other unique circumstances.
 - b. There are no filing requirements for these contracts or supporting information, except that the companies are required to file copies of signed contracts along with supporting cost information upon request from the KPSC or staff.
 - c. If the Commission or staff requests the filing, companies will be allowed to redact the customer name and address on the contract that is filed for the public record. (This provision, which is consistent with the privacy expectations of some customers and protects the contracting company from providing valuable market information to competitors, is the standard in the other states served by BellSouth – Alabama, Florida, Louisiana, Georgia, Mississippi, South Carolina, North Carolina, and Tennessee – and in the other state served by Cincinnati Bell - Ohio.)
3. For purposes of these standards, the following are examples of when a carrier may use CSAs in order to meet competition or to account for other unique circumstances:
 - a. A customer has an offer (written or oral) from a competitor or, because of general knowledge of the level of competition in an area or market segment, it is reasonable for a company to believe that a customer has an offer from a competitor;
 - b. Competitive offers have been made to customers in an area or market segment via some form of media or other communication;
 - c. A company determines that it should give a customer a discount in recognition of the customer maintaining a specified service or group of services for a specified period of time;
 - d. A company determines that it should give a customer a discount in recognition of the total billed revenue a customer brings to the company or total volume of services purchased by the customer; and
 - e. A company determines that it should give a customer a discount in recognition of the potential that the customer will generate additional revenue by purchasing integrated service packages or bundles.

CERTIFICATE OF SERVICE

It is hereby certified that a true and accurate copy of the foregoing was served on the individuals on the attached Service List by first-class mail, postage prepaid, on the 25th day of September 2003.

Thomasina Wooldridge

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